

Seth Alexander Cannon

Permanent Address: 2133 Duffers Lane
Evansville, IN 47725

School Address: Defoe-Graham Hall
901 Hitt Street, 1960A
Columbia, MO 65201

January 28, 2025

RE: *In re College Athlete NIL Litigation*
No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Seth Cannon. I am a current Division 1 athlete at The University of Missouri and my NCAA EID is 2207599546. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

/s/ *Seth Cannon*
Seth A. Cannon

F I L E D

FEB 06 2025 *ay*

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: COLLEGIATE ATHLETE NIL LITIGATION Case No. 4-20-cv-03919-CW

Honorable Claudia Wilken

DECLARATION OF SETH ALEXANDER CANNON

I, Seth Alexander Cannon, hereby declare as follows pursuant to 28 U.S.C. §1746:

1. I am a freshman at The University of Missouri and am a member of the NCAA Division 1 men's swim team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.
2. Please find attached my objection and plea to the court to reconsider impending roster limits associated with the above referenced case number.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 28, 2025
Columbia, Missouri

Signed: /s/ *Seth Alexander Cannon*

Seth Alexander Cannon
NCAA EID Number: 2207599546
Permanent Mailing Address:
2133 Duffers Lane
Evansville, IN 47725
School Mailing Address:
Defoe-Graham Hall
901 Hitt Street, 1960B
Columbia, MO 65201

An Essay Discussing Roster Limits

By Seth Cannon

I did it! I just signed my National Letter of Intent. My lifelong dream of becoming a division one collegiate athlete was complete. For as long as I can remember, I have wanted to be an NCAA athlete at this level. I think back to watching the NCAA men's basketball tournament when I was little and wanting to be just like them. I think back to telling other kids at my elementary school that I would be an athlete in college, and them telling me that there was no chance. I think back to watching other athletes at my high school sign to compete at the next level and wanting to be like them. I think back to the mornings when my alarm went off at four-thirty, and the only thing that got me out of bed was my goal of competing at the collegiate level. I think back to all the challenges with self-doubt and confidence I had to overcome to make it to this level. I did it! All the sacrifices those close to me made to help me achieve my goal were worth it. Everyone at the signing is clapping for me as I deliver a speech I prepared in advance, thanking everyone who helped me along the way. From club coaches to teammates who had been with me for ten or more years to my family, I thank them all. I hear my teammates yelling my name and cheering for me, and I smile. I look down at my parents, who are smiling back at me. I did it! I am so excited for my future and the next four years of collegiate athletics.

Fast forward through the summer to move-in day in August, I was nervous to say the least – excited, but fearful of the unknown. What if I did not get along well with my teammates? What if I do not have a good relationship with my roommate? Do I belong here?

What if I am not good enough? Questions like this ran through my mind constantly as I made the four-hour drive from my hometown. When I eventually arrived on campus, the nervousness only increased. After getting moved in, I attended a dinner at the head coach's house for all those new to the team. Unbeknownst to me, I had just met the greatest group of friends I could ever imagine. For as long as I can remember, I have had trouble being away from home. Homesickness had oftentimes been a problem during extended time away, and I was unsure how I would fare being away for months at a time. As I began to get to know these people, however, I began to feel more confident being away from home. They made me feel more comfortable by inviting me to different activities. I am so thankful they cared enough to ask. These are some of my most fond memories thus far. I remember everything from impromptu runs to Insomnia Cookies to playing video games in someone's room, going to various athletic events and playing football in 14 inches of snow when no one else was on campus. I feel at home here now, and that is thanks to my teammates.

In addition to feeling at home, I have loved being a part of this competitive team. Coming from a small club in Southern Indiana, it was rare that I would have another male swimmer with which to train. While I had teammates, they were not as motivated as I was to excel. I never felt like they wanted to be there, as most would go through the motions and do the bare minimum, often with bad attitudes. This behavior annoyed me, and it made me begin to dislike swimming. I was tired of being the only one who cared and the only one who wanted to compete at the next level. When I arrived at The University of Missouri, I finally had the team environment I had craved. This group of people not only wanted to be great themselves, but for

the team to be great as well. After our first practice, I could tell how much they desired to be there, to work hard and to have fun while we were there. I have never looked forward to going to practice as much as I do with this team. I wake up excited to swim. I know I have never laughed as much at five in the morning as I do now, and it makes the hard practices more bearable. I love swimming like never before, and that is thanks to my team.

However, it could all end as quickly as it began. My dream of being a Division 1 athlete could end before it even really gets going. I would be lying if I said the *House vs. NCAA* settlement has not been hanging over our heads all year. It has been a black cloud over the entire team as well as the coaching staff, who are not looking forward to cutting the roster down to twenty-two men and thirty women because of this settlement. I know there are countless swimmers, including myself, who are worried about their futures. I genuinely have no idea where I will be living this time next year. I have no idea where I will be going to school or if I will be able to continue in a major that supports my career goal of becoming a physician. If it all works out, I will be here – with the friends I have made, the team I love, my career-oriented curriculum and where I feel like I belong. Or, I will have to transfer and start over with an entirely new group of friends and teammates, a new major as well as reliving all the worries of that first couple of weeks of college.

Finally, my future collegiate career is decided entirely by my performance in the pool this year, which adds a heavy layer of stress to every meet. Every time I step up on the blocks, I know I am swimming for my spot next year. I am swimming for my spot among the twenty-two.

It sucks. It really does. It sucks to see the toll it takes on my teammates, and how much they worry about where they are going to be this time next year. It also sucks to see how it has affected those close to me, as they spend so much of their time trying to help me in any way they can. It is not about the money, or my relatively small scholarship compared to what other sports are given. The challenge of being a Division 1 student athlete by itself is daunting without the stress added by this settlement agreement. It has been a struggle to maintain focus with roster cuts looming. I do not want NIL money. What I want is the scholarship I earned and the opportunity to continue my career as a Mizzou Tiger so that I can stop worrying about my future. I need to be able to continue to grow as a student and an athlete with my team, my coaches and my classmates, instead of starting over. All I need is the chance.

Brandi Doyle Hahn

2133 Duffers Lane
Evansville, IN 47725

brandidoylehahn@gmail.com
(812) 204-5986

RE: *In Re Collegiate Athlete NIL Litigation*

Case No.: 4:20-cv-03919-CW
Seth Alexander Cannon
NCAA EID: 2207599546

Honorable Claudia Wilken:

I am writing to express my objection to the *House v. NCAA* settlement that will ultimately impose roster limits for collegiate athletic teams, specifically swim teams within the SEC.

In November, 2023, my son signed a National Letter of Intent with the NCAA, SEC and the University of Missouri. He received this opportunity after years of hard work and dedication in order to pursue his dream of becoming a collegiate student athlete. He spent years practicing before school, after school and on the weekends. Due to his rigorous practice schedule, he chose to miss football and basketball games as well as other typical high school activities because he knew that sacrifice would be required to achieve his goal. Seth not only put in innumerable hours in the pool but also in his academic pursuits. He takes the role of STUDENT athlete very seriously. When Seth was recruited by the University of Missouri, he immediately fell in love with the chemistry of the coaches and the team. They made him feel like he was already part of the team. My son loves the team aspect of athletics and puts the team goals ahead of his own personal goals. This was the part of college swimming that he was most excited about and that is in danger of being snuffed out as individual pursuits become more important than the team.

Upon committing to MU, his head coach made the four-year plan for Seth's athletic scholarship very clear. The possibility of being cut from the team was never mentioned. In addition to his athletic scholarship, Seth also earned a prestigious four-year academic scholarship and was admitted to the university's honors program. On signing day, he signed multiple pages of a contract that specifically stated that his scholarship was for the period of four academic years and from the time period of 2024-2028. Seth has upheld every bit of his responsibilities. He attends practice faithfully, gives his best effort, is an excellent teammate, attends all meetings and volunteer opportunities, excels in the classroom (as evidenced by his 4.0 GPA), loves his university and especially his Tiger teammates. It's unfortunate that his team building experience has been tainted by the fear of wondering if he will be there next year.

Recently, I attended Senior Day for The University of Missouri swim and dive team. It was very disheartening to watch the camaraderie of the seniors who have had the benefit of being on a team for four years together knowing that my son may not get the chance to have this experience through no fault of his own. These student athletes had the opportunity to develop and mature under the leadership of their coaches because they had four guaranteed years to develop personal relationships with them. This is a luxury that my son will not be allowed due to the ramifications of this settlement. Instead, he has spent his freshman year on pins and needles awaiting the fallout of *House v. NCAA*.

In addition to the potential loss of athletic scholarships and inability to finish his college career with his teammates, Seth has also experienced significant emotional stress. As his mom, it is heartbreaking to see my normally confident and resilient child with his head down and tears in his eyes because he no longer feels like he is good enough. He signed up for a four-year plan to grow and develop as a swimmer and human being. Because of these proposed roster cuts, he is not being allowed this opportunity. Furthermore, his academic future feels uncertain. He is excelling in a major that is not offered at many universities and, if the settlement is approved as is, he will need to rethink his major as well as apply to transfer to another university that may not have the academic esteem of the University of Missouri.

In conclusion, it is my prayer that the honorable judge would consider all of the ramifications of the settlement on, not just my son, but college athletics as a whole. Imposed roster cuts will weaken the system of developing not only exceptional athletes that compete on a national and worldwide stage, but the overall opportunity for student athletes to glean the results of their hard work in the real world. The majority of student athletes would prefer the opportunity to develop and compete over receiving a small financial pay out that is considerably less than the scholarships that they earned.

Thank you for taking the time to read the heartfelt concerns of the mom of a freshman SEC athlete. His name is Seth and he is the consummate teammate who embodies hard work and dedication. He has done his part. My prayer is that he is seen and heard and that the commitment he signed is honored by the other parties involved.

Sincerely,

/s/ *Brandi Hahn*

Brandi Hahn (Seth's mom)

Christopher B. Cannon

8238 Pelican Pointe
Evansville, IN 47725
ccannon995@outlook.com
(812)204-9471

January 28, 2025

RE: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW
Seth Alexander Cannon, NCAA EID: 2207599546

Honorable Judge Wilken:

I am writing to express my strenuous objection to the handling of the aftermath of the House vs. NCAA decision. In an effort to repay athletes of the past, they are hurting the current athletes and athletes of the future. There needs to be a common-sense approach which minimizes the impact on the current athletes and their families.

Our son is swimming at an SEC school. This has been his goal/dream for at least 5 years. You already know the commitment required to achieve this goal while maintaining an excellent GPA: missed sleep and parties to get up for Saturday morning practice, or missing vacations to not impact the training cycle. He is adapting to the weekly demands of 30+ hours of practice, 15+ hours of classes, homework, volunteering, prehab, rehab. He does this enthusiastically to realize his dream. He earned the spot but now is on the outs through no fault of his own but simply due to this legal decision and its more or less unexpected consequences.

He chose his school for a variety of reasons, one of which was a unique pre-professional major – Nutrition and Exercise Physiology. While it might be at other institutions, in the pre-professional form it is very rare. When he is forced to transfer, he will need to abandon this major to adopt something else and will end up having wasted classes from his first year.

The culture of the teams is suffering and will continue to suffer from this looming roster cut. No longer can you be happy for your teammates' success. Regardless of the outlook, you have to be at least a little down when you see your teammate perform well because you know that you might be gone now. These athletes have had the black cloud of roster cuts hanging over their heads the entire season and then it just became reality for many of them in December. The teams, coaches, and campuses they love will be taken from them through no fault of their own. This has definitely contributed negatively to their mental health. Our son has been so weary this season because even when excited about something good, he has the weight of knowing it's all likely temporary. I can say from the parent point of view, I have been reluctant to really interact much with other parents in the stands since I am viewing them as temporary at best and potentially, as competition for the limited roster spots.

In conclusion, in an effort to compensate previous athletes, the current and future athletes are being sacrificed. It would make much more sense to roll this over the course of 4 years. This would give coaches, athletes, and future athletes time to prepare and plan accordingly. In summary, I am hoping that the pleas of student athletes, like our Seth, are heard and considered. I am hopeful that doing what is best for all parties in light of this legal decision is at the forefront of the Court's thoughts when evaluating options.

Respectfully,

/s/ Chris Cannon
Chris Cannon

DINSMORE & SHOHL LLP
City Center
100 West Main Street
Suite 900
Lexington, KY 40507



quadient
FIRST-CLASS MAIL
IMI
\$002.04⁰
01/31/2025 ZIP 40507
043M31253925

Dinsmôre

RONALD V. DELLUMS FEDERAL BUILDING &
UNITED STATES COURTHOUSE
C/O CLASS ACTION CLERK
1301 CLAY STREET
OAKLAND, CA 94612